

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,**

*

Plaintiff

*

v.

*

Civil Action No. S 00 CV 2918

WILLIAM F. MAHON, et al.,

*

Judge William D. Quarles

Defendants

*

* * * * *

**ANSWER OF RELIEF DEFENDANTS SEAN JUPITER, DEREK JUPITER
AND LEE JUPITER TO FIRST AMENDED COMPLAINT**

Sean Jupiter, Derek Jupiter and Lee Jupiter, Relief Defendants, by their attorneys, answer the First Amended Complaint of Plaintiff, United States Securities and Exchange Commission, as follows:

1. As to paragraph 9, they admit that they currently reside in the United States; however, Sean Jupiter and Derek Jupiter are in the United States Military and are expected to be deployed to the country of Iraq in the very near future; and they are without knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 9.

2. They are without knowledge or information sufficient to form a belief as to the truth of the allegations of paragraphs 1 (erroneously designated as paragraph 4 in the First Amended Complaint), 2, 4, 5, 7, 8, 10 through 15 and 19 through 68 and demand strict proof thereof.

3. As to paragraphs 16, 17 and 18, they admit they are the sons of Dean Jupiter, but deny the remaining allegations.

4. They deny the allegations of paragraphs 3, 6, 69 through 72 and each and every other allegation of the First Amended Complaint not specifically admitted herein.

WHEREFORE, Relief Defendants, Sean Jupiter, Derek Jupiter and Lee Jupiter, request that the Court deny the relief requested in Plaintiff's First Amended Complaint for Permanent Injunction and Other Equitable Relief.

KENNY & VETTORI, LLP

By: _____

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Bar No. 00122

*Attorneys for Relief Defendants Lee Jupiter, Sean
Jupiter and Derek Jupiter*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _____ day of December, 2004, a copy of the foregoing Answer of Relief Defendants to the First Amended Complaint For Permanent Injunction and Other Equitable Relief has been filed electronically pursuant to Fed. R. Civ. P. 5 (b) (2) (D) and that Notice of this filing will be sent electronically to Carolann Gemski, Esquire, attorney for Plaintiff, Unites States Securities and Exchange Commission, 175 West Jackson Boulevard, Suite 900, Chicago, Illinois, 60604 and to Allan M. Lerner, Esquire, 2888 East Oakland Park Boulevard, Fort Lauderdale Florida 33306.

Paul M. Vettori